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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

**IN RE: INCRETIN-BASED  
THERAPIES PRODUCTS  
LIABILITY LITIGATION**

**Relates to: ALL CASES**

**Master File No.: 3:13-md-02452-AJB-MDD**

**MDL – 2452**

**PLAINTIFFS' MOTION TO FILE  
CERTAIN DOCUMENTS IN SUPPORT  
OF THEIR MEMORANDUM IN  
OPPOSITION TO DEFENDANTS'  
MOTION FOR SUMMARY JUDGMENT  
ON THE AFFIRMATIVE DEFENSE OF  
PREEMPTION UNDER SEAL BY PARTY  
THAT OPPOSES SEALING**

Pursuant to Local Rule 79.2(b), ECF Administrative Policies and Procedures 2(j), and Honorable Anthony J. Battaglia Civil Case Procedures Section IV, Plaintiffs have filed certain documents that discuss documents that have been designated Confidential by one or more of the Defendants under seal. Plaintiffs oppose the sealing of these documents. However, the parties have reached an agreement, in consultation with chambers, to defer substantive briefing on the motions to seal until after all responses and replies have been filed. The parties will soon submit a joint motion with a proposed order. Plaintiffs have filed this initial motion to seal in compliance with the Court's order regarding sealing, but they hereby reserve all arguments in opposition for their substantive brief.

DATED: July 17, 2015

**PLAINTIFFS' COUNSEL**

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